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Attorneys for General Motors LLC

**UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA
 SAN FRANCISCO DIVISION**

RAUL SIQUEIROS, et al.,

Plaintiffs,

v.

GENERAL MOTORS LLC,

Defendant.

Case No.: 16-cv-07244-EMC

**STIPULATION AND JOINT MOTION
 TO HOLD MOTIONS IN ABEYANCE
 WITH ~~PROPOSED~~ ORDER**

Hon. Edward M. Chen

1 Plaintiffs Joshua Byrge, Jill Cralley, Todd Cralley, William Davis, Jr., Gabriel Del Valle,
2 Carlos Gamez, Larry Goodwin, John Graziano, Rudy Sanchez, Scott Smith, and Garet Tarvin (the
3 “Plaintiffs”) and General Motors LLC (“GM”) (collectively, the “Parties”), hereby stipulate and
4 jointly move this Court for an order holding pending motions in abeyance for ninety (90) days, with
5 one exception.

6 WHEREAS, on February 9, 2024, Plaintiffs filed their Motion for Final Judgment,
7 Prejudgment Interest, Statutory Attorneys’ Fees, and Costs (ECF No. 654) and their Motion for
8 Common Fund Attorneys’ Fees and Costs, and Class Representative Service Awards (ECF No.
9 655) (“Fee Motions”) following a jury trial of the certified class claims in September and October
10 2022.

11 WHEREAS, on September 18, 2024, the Court held a hearing on Plaintiffs’ Fee Motions,
12 and instructed plaintiffs to provide a more precise estimate of the number of North Carolina class
13 members by November 20, 2024.

14 WHEREAS, on October 2, 2024, Plaintiffs Tarvin, Del Valle, and Davis informed the Court
15 of their consent to dismissal of their individual claims under Fed. R. Civ. P. 41(a)(1)(A)(ii) (ECF
16 No. 703).

17 WHEREAS, on November 20, 2024, Plaintiffs filed a Motion for Authorization of Text
18 Messaging to Potential Class Members, requesting the Court allow the Class Administrator to
19 contact, via text messaging, potential North Carolina Class members whose membership has not
20 yet been verified (ECF No. 704). Plaintiffs’ efforts to contact potential members of the North
21 Carolina Class are ongoing.

22 WHEREAS, GM does not oppose Plaintiffs’ Motion for Authorization of Text Messaging
23 to Potential Class Members, and the Parties submit that the motion may be decided without oral
24 argument.

25 WHEREAS, as of December 3, 2024, Plaintiffs’ Fee Motions and Plaintiffs’ Motion for
26 Authorization of Text Messaging to Potential North Carolina Class Members remain pending.

27 WHEREAS, the Parties have agreed to explore potential resolution of this action and seek
28 to preserve the status quo during those discussions and thus respectfully ask the Court to hold

1 Plaintiffs' Fee Motions (ECF Nos. 654 and 655) in abeyance for ninety (90) days.

2 WHEREAS, the Parties agree that Plaintiffs' efforts to identify and quantify members of
3 the North Carolina class should continue.

4 IT IS HEREBY STIPULATED that, subject to this Court's approval, Plaintiffs Fee Motions
5 (ECF Nos. 654 and 655) will be held in abeyance for ninety (90) days, up to and including March
6 3, 2025, during which time the Court will proceed with ruling on Plaintiffs' unopposed Motion for
7 Authorization of Text Messaging to Potential Class Members (ECF No. 704).

8
9 DATED: December 3, 2024

10 /s/ Adam J. Levitt

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Respectfully submitted,

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STIPULATION AND JOINT MOTION TO
HOLD MOTIONS IN ABEYANCE

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*Additional Counsel for Plaintiffs and the
Classes*

ORDER

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated this 5 day of December, 2024


THE HONORABLE EDWARD M. CHEN
UNITED STATES DISTRICT JUDGE